

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)
SALDUTTI LAW GROUP
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In Re:

Fastline Cargo, LLC d/b/a FLC,

Debtor.

Case No.: 24-17484-ABA

Chapter: 11

Hrg Date: Sept. 17, 2024 at 10:00AM

Judge: Hon. Andrew B. Altenburg, Jr.

STATEMENT AS TO WHY NO BRIEF IS NECESSARY

The within Motion requests relief from the automatic stay to permit to exercise its rights under applicable non-bankruptcy law with respect to the motor vehicles described in the Motion, including replevin and all actions related thereto.

As the facts the movant relies upon, as set forth on the accompanying certification, and the basis for the request for relief from the automatic stay do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the Motion.

Respectfully submitted,
SALDUTTI LAW GROUP
Counsel for Santander Bank, N.A.

/s/ Rebecca K. McDowell
REBECCA K. MCDOWELL, ESQ.

Dated: August 22, 2024